

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In Re:

Case No: 10-08588

JORGE L OBEN CARRERAS

Chapter 13

Debtor(s)

MOTION TO INFORM AMENDED PLAN

TO THE HONORABLE COURT:

NOW COMES the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That today the debtor is filing an amended chapter 13 repayment plan.
2. That the reason for amendment is to provide for Crim's secured claim.

WHEREFORE, it is respectfully requested to this Honorable Court to take notice of the aforementioned.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mail to debtor (s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

In San Juan, Puerto Rico this 3rd day of March of 2011.

JPC LAW OFFICE

Jose M Prieto Carballo, Esq
P.O. Box 363565
San Juan, P.R. 00936-3565
Tel (787) 607-2066 & Tel (787) 607-2166
jpc@jpcclawpr.com

By: /s/ Jose M Prieto Carballo, Esq.

United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. 10-08588-13

OBEN CARRERAS, JORGE L

Debtor(s)

Chapter 13

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____

☐ PRE ☐ POST-CONFIRMATION

☒ AMENDED PLAN DATED: 3/03/2011

Filed by: ☒ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

\$ 1,500.00 x 60 = \$ 90,000.00
\$ _____ x _____ = \$ _____
\$ _____ x _____ = \$ _____
\$ _____ x _____ = \$ _____
\$ _____ x _____ = \$ _____

TOTAL: \$ 90,000.00

Additional Payments:

\$ 200,000.00 to be paid as a LUMP SUM
within 18 months with proceeds to come from:

☒ Sale of Property identified as follows:
OF REFINANCE OF PROPERTY

☐ Other:

Periodic Payments to be made other than, and in
addition to the above:

\$ _____ x _____ = \$ _____

PROPOSED BASE: \$ 290,000.00

III. ATTORNEY'S FEES
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee
Disclosure Statement: \$ 2,823.00

Signed: /s/ JORGE L OBEN CARRERAS
Debtor

Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR \$ _____

B. SECURED CLAIMS:

☐ Debtor represents no secured claims.

☒ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☒ Trustee pays secured ARREARS:

Cr. BPPR Cr. _____ Cr. _____
71010011775098 # _____ # _____
\$ 900.00 \$ _____ \$ _____

2. ☒ Trustee pays IN FULL Secured Claims:

Cr. CRIM Cr. LUIS FARGAS BENITES Cr. _____
_____ # _____ # _____
\$ 72.00 \$ 225,000.00 \$ _____

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
\$ _____ \$ _____ \$ _____

4. ☒ Debtor SURRENDERS COLLATERAL to Lien Holder:

COOP JESUS OBRERO

5. ☐ Other:

6. ☒ Debtor otherwise maintains regular payments directly to:

BPPR

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.
11 U.S.C. § 507 and § 1322(a)(2)

D. UNSECURED CLAIMS: Plan ☐ Classifies ☒ Does not Classify Claims.

1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: _____
☐ Paid 100% / ☐ Other: _____

Cr. _____ Cr. _____ Cr. _____
_____ # _____ # _____
\$ _____ \$ _____ \$ _____

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)
See Continuation Sheet

Attorney for Debtor Jose Prieto

Phone: (787) 607-2066

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN
Continuation Sheet - Page 1 of 2

Cr

#

\$

Executory Contracts - Assumed:BPPR
FIRST BANK OF PR**Executory Contracts - Rejected:**

BPPR

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN
Continuation Sheet - Page 2 of 2

FAILURE TO TIMELY OBJECT TO THIS PLAN BY A CREDITOR CONSTITUTES A WAIVER OF THE EQUAL MONTHLY AMOUNT METHOD OF PAYMENT 11 USC 1325 (a)(5).

ATTORNEY'S FEES WILL BE PAID AHEAD OF SECURED CREDITORS PER 11 USC 330.

TAX REFUNDS, IF ANY ARE RECEIVED BY DEBTOR, WILL BE TENDERED TO THE TRUSTEE AS PERIODIC PAYMENTS TO FUND THE PLAN UNTIL PLAN COMPLETION IN ADDITION TO PAYMENTS ALREADY PROVIDED HEREIN. IF DEBTOR(S) NEED TO USE ANY PART OF THESE FUNDS, PROPER AUTHORIZATION WILL BE SOUGHT FROM THE COURT FOR SUCH PURPOSE.

DEBTOR WILL REJECT LEASE WITH FIRST BANK SINCE VEHICLE IS PAYED AND USED BY A THIRD PARTY

DEBTOR WILL REJECT LEASE WITH BPPR SION SINCE ITS BEEN PAYED AND USED BY A THIRD PARTY

DEBTOR WILL CURE ARREARS WITH BPPR AUTO CLAIM 12 FOR CHYSLER 300C

ADEQUATE PROTECTION TO LUIS FARGAS SECURED CREDITOR IN THE AMOUNT OF \$1,000.00 MONTHLY.

DEBTOR CONSENTS TO THE LIFT OF STAY IN FAVOR OF CREDITOR FRANCISCO FIGUEROA FUENTES, WITH REGARDS TO THE SECURED PORTION OF HIS CLAIM

Label Matrix for local noticing
0104-3
Case 10-08588-BKT13
District of Puerto Rico
Old San Juan
Tue Nov 16 17:21:42 AST 2010

RECOVERY MANAGEMENT SYSTEMS CORP
RAMESH SINGH
25 SE 2ND AVE STE 1120
MIAMI, FL 33131-1605

American Express TRS Co Inc Latin American
Division
c/o Becket and Lee LLP
POB 3001
Malvern PA 19355-0701

CAPITAL ONE
P O BOX 2270
SOUTHGATE, MI 48195-4270

COOPERATIVA A/C JESUS OBRERO
PMB 159 HC 01 BOX 29030
CAGUAS, PR 00726-4900

DISCOVER
P.O. Box 6103
Carol Stream, IL 60197-6103

FIRST BANK OF PR
P O BOX 19327
SAN JUAN, PR 00910-1327

IRS
P O BOX 21125
PHILADELPHIA, PA 19114-0325

LUIS FARGAS BENITEZ
1509 LOPEZ LANDRON 10TH FLOOR
SAN JUAN PR 00911-1933

POPULAR AUTO (POPULAR LEASING)
BANKRUPTCY DEPARTMENT
PO BOX 366818
SAN JUAN PUERTO RICO 00936-6818

BANCO POPULAR DE PUERTO RICO
c/o WALLACE VAZQUEZ SANABRIA
17 MEXICO STREET, SUITE D-1
SAN JUAN, PR 00917-2202

US Bankruptcy Court District of P.R.
U.S. Post Office and Courthouse Building
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

BANK OF AMERICA
P O BOX 1532
WILMINGTON, DE 19899-1532

CHARLES CANDELARIA FARRULLA
PO BOX 40704
SAN JUAN, PR 00940-0704

CR Evergreen, LLC
MS 550
PO Box 91121
Seattle, WA 98111-9221

Discover Bank
Dfs Services LLC
PO Box 3025
New Albany, OH 43054-3025

FIRST SOURCE ADVANTAGE LLC
P O BOX 628
BUFFALO, NY 14240-0628

LESTER TORO ACOSTA
P O BOX 3916
CAROLINA, PR 00984-3916

LUIS GARCIA MAGARIDA
PO BOX 9533
SAN JUAN, PR 00908-0533

SALLIMAE
P O BOX 9235
WILKES BARRE, PA 18773

FIRSTBANK PUERTO RICO
PO BOX 9146
SAN JUAN, PR 00908-0146

AMERICAN EXPRESS
P O BOX 360001
FORT LAUDERDALE, FL 33336-0001

BPPR
P O BOX 366818
SAN JUAN, PR 00936-6818

CITIFINANCIAL
P O BOX 70919
CHARLOTTE, NC 28272-0919

CRIM
P O BOX 195387
SAN JUAN, PR 00919-5387

FIRST BANK
BANKRUPTCY DIVISION
PO BOX 9146
SAN JUAN PR 00908-0146

FRANCISCO FIGUEROA FUENTES
PO BOX 196
GUAYNABO, PR 00970-0196

LUIS FARGAS BENITES
1509 LOPEZ LANDRON 10TH FLOOR
AMERICAN AIR LINES BUILDING
SAN JUAN, PR 00911-1933

PEDRO NICOT SANTANA
PO BOX 360486
San Juan, PR 00936-0486

JORGE L OBEN CARRERAS
P O BOX 13451
SAN JUAN, PR 00908-3451

JOSE M PRIETO CARBALLO
JPC LAW OFFICE
PO BOX 363565
SAN JUAN, PR 00936-3565

JOSE RAMON CARRION MORALES
PO BOX 9023884
SAN JUAN, PR 00902-3884

MONSITA LECAROS ARRIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901-1938

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)BANCO POPULAR DE PUERTO RICO
c/o WALLACE VAZQUEZ SANABRIA
17 MEXICO STREET, SUITE D-1
SAN JUAN, PR 00917-2202

(d)CitiFinancial, Inc
P.O. Box 70919
Charlotte NC 28272-0919

(d)LUIS FARGAS BENITEZ
1509 Lopez Landron
10th Floor
San Juan, PR 00911-1933

End of Label Matrix
Mailable recipients 32
Bypassed recipients 3
Total 35